

1 Theodore A. Griffinger, Jr. (SBN 66028)
2 Tanya Herrera (SBN 177790)
3 STEIN & LUBIN LLP
4 Transamerica Pyramid
5 600 Montgomery Street, 14th Floor
6 San Francisco, CA 94111
7 Telephone: (415) 981-0550
8 Facsimile: (415) 981-4343
9 tgriffinger@steinlubin.com
10 thererra@steinlubin.com
11
12 Attorneys for Defendants,
13 JON SABES, STEVEN SABES AND MARVIN
14 SIEGEL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 SUZANNE D. JACKSON,
14 Plaintiff,
15 v.
16 WILLIAM FISCHER; JON SABES;
17 STEVEN SABES; DAVID GOLDSTEEN;
18 MARVIN SIEGEL; BRIAN CAMPION;
19 LONNIE BROOKBINDER; CHETAN
NARSUDE; MANI KOOLASURIYA;
20 JOSHUA ROSEN; UPPER ORBIT, LLC;
SPECIGEN, INC.; PEER DREAMS INC.;
NOTEBOOKZ INC.; ILEONARDO.COM
INC.; NEW MOON LLC; MONVIA LLC;
21 and SAZANI BEACH HOTEL,
Defendants.

Case No. 3:11-cv-02753-JSW

23 Plaintiff Suzanne Jackson and Defendants Jon Sabes, Steven Sabes and Marvin
24 Siegel (collectively "Defendants"), by and through their counsel, and subject to the Court's
25 approval, stipulate as follows:

28 **WHEREAS**, the FAC asserts purported federal securities fraud and common law

1 claims related to Plaintiffs' investments;

2 **WHEREAS**, the FAC alleges, *inter alia*, that Defendants engaged in a
3 comprehensive scheme to defraud Plaintiff in violation of the Securities Exchange Act of 1934
4 and the Securities Act of 1933 and by failing to provide and failing to disclose material facts,
5 which purportedly constitute common law fraud;

6 **WHEREAS**, the parties agree that the FAC's scope and complexity warrant a
7 modest increase in the page limits imposed by this Court's Civil Standing Orders for Defendants'
8 opening brief and Plaintiff's opposition brief to Defendants' motion to dismiss, but that the page
9 limit for Defendants' reply brief shall remain 15 pages;

10 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY**
11 **AND BETWEEN THE PARTIES**, subject to the Court's approval, that:

12 1. Defendants' memorandum of law in support of their motion to dismiss shall
13 not exceed 25 pages; and

14 2. Plaintiffs memorandum of law in opposition to Defendants' motion to
15 dismiss shall not exceed 25 pages.

16 Dated: January 6, 2011

KAUFMAN LLC

17
18 By: /s/ Alan H. Kaufman
19 Alan H. Kaufman
Attorneys for Plaintiff Suzanne D. Jackson

20 Dated: January 6, 2011

STEIN & LUBIN LLP

21
22 By: /s/ Tanya Herrera
23 Tanya Herrera
Attorneys for Defendants
24 Jon Sabes, Steven Sabes and Marvin Siegel

25
26
27
28

PROPOSED ORDER

Having reviewed the above stipulation, **IT IS HEREBY ORDERED** that the page limits for the motion to dismiss briefing in this matter shall be:

Defendants' motion to dismiss: 25 pages

Plaintiff's opposition to Defendants' motion to dismiss: 25 pages

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: January 11, 2012

The Honorable Jeffrey S. White
United States District Judge

By: CHIEF JUDGE JAMES WARE